Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Advanced Television Systems	)	MB Docket No. 87-268
And Their Impact Upon the Existing	)	
Television Broadcast Service	)	
	)	

To: The Commission

PETITION FOR SPECIAL RELIEF
BY KMBC HEARST-ARGYLE TELEVISION, INC.

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December 10, 2007

PETITION FOR SPECIAL RELIEF

KMBC Hearst-Argyle Television, Inc. ("Hearst"), the licensee of KMBC-TV and KMBC-DT, Kansas City, Missouri, by and through its undersigned attorneys, hereby respectfully files this Petition for Special Relief in the above-captioned proceeding. Hearst hereby requests that the Commission reconsider the channel and technical facility it assigned to KMBC-DT in Appendix B of the final digital table of allotments ("DTV TOA") in connection with the Commission's decision in *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Seventh Report and Order and Eighth Further Notice of Proposed Rulemaking, 22 FCC Rcd 15581 (2007) ("*Seventh Report and Order*"). Specifically, Hearst requests the substitution of Channel 29 for its assigned Channel 9 in the DTV TOA.

Notwithstanding that the deadlines for filing formal comments and petitions for reconsideration of the *Seventh Report and Order* have now passed, it is respectfully requested that the Commission consider the instant Petition for Special Relief.[1] Hearst's parent company is also the parent company of KCWE(TV), Kansas City, Missouri. KCWE(TV)'s NTSC operation is on Channel 29, which KCWE(TV) will be turning in at the end of the DTV transition. While Appendix B of the DTV TOA specifies that KMBC-DT will move its current Channel 7 DTV operation to its current NTSC Channel 9, Hearst has recently determined that in lieu of moving to Channel 9, a more preferable allotment would be to move KMBC-DT to Channel 29 upon the termination of KCWE(TV)'s NTSC operation on Channel 29. As explained below and in Exhibit A, the requested substitution of Channel 29 for Channel 9 complies with the

[1] Indeed, acceptance and consideration of the instant filing would be consistent with the Commission's treatment of other late-filed requests for changes to the DTV TOA Appendix B data in this proceeding. *See Seventh Report and Order*, ¶ 141.

Commission's current 0.1 percent interference standard and is otherwise consistent with the public interest.

Specifically, Hearst requests that the Commission change the data in Appendix B of the DTV TOA for KMBC-DT's post-transition operation to specify operation on Channel 29 as follows:

Requested Change to DTV TOA

Current TOA Data for KMBC-DT	Requested TOA Data for KMBC-DT
Channel 9	Channel 29
357 meters HAAT	358 meters HAAT
85 kW ERP	1000 kW ERP
Directional	Non-Directional

Hearst has engaged consulting engineer Bernard R. Segal, P.E., to study the proposed substitution of Channel 29 for Channel 9. Mr. Segal's engineering statement and figures are attached hereto as Exhibit A (the "Engineering Statement"). As discussed in the Engineering Statement, the instant request complies with the Commission's 0.1 percent interference standard. *See* Engineering Statement, at 1-2. As such, the proposed substitution of Channel 29 will not result in any harmful interference to any other station's allotment in the DTV TOA.

The Engineering Statement notes that the proposed Channel 29 allotment would provide interference-free service to approximately 51,000 fewer persons than the current Channel 9 allotment, *see id.*, at 2, and would result in an ABC Network service white area of 8,669 persons, *see id.*, at 5. Notwithstanding the service loss, there are countervailing public interest considerations that support grant of the instant request. Indeed, the Commission has approved

population coverage decreases of significantly more persons where there are offsetting factors. *See KNTV License Inc.*, 19 FCC Rcd 1751, DA 04-2523 (2004) (approving a net population decrease of more than a million people, including 21,170 viewers who would lose their only over-the-air NBC network service). The offsetting public interest factors in this case are as follows:

First and foremost, absent KMBC-DT's ability to operate on Channel 29, KMBC-DT would be the only VHF channel in the Kansas City market. Of all of the stations allotted to Kansas City, KMBC-DT is the only station with a DTV allotment in the VHF band. *See id.*, at 6. As such, to receive the best over-the-air reception of KMBC-DT's programming on the Channel 9 allotment, viewers would need to purchase and install separate VHF antennas solely for KMBC-DT reception. Given the fact that VHF antennas are significantly larger than UHF antennas, the public generally is only inclined to purchase and install UHF antennas. Indeed, when satellite carriers have provided Kansas City viewers with antennas for over-the-air reception of local television stations, those antennas are typically UHF-only antennas.

The VHF reception problem in the Kansas City market is not merely theoretical. KMBC-DT already has experience with viewer reception problems that result due to being the only VHF DTV channel in the market. KMBC-DT's current DTV transition channel is VHF Channel 7, and as with KMBC-DT's post-transition Channel 9 allotment, the station's current Channel 7 DTV operation is the only current VHF DTV station in the Kansas City market. Nearly every day Hearst receives viewer complaints and comments concerning VHF reception problems.

For example, on November 24, 2007, one frustrated viewer wrote "I was just curious if KMBC has any plans to strengthen its HDTV signal or if perhaps there's something wrong with

my current system and I need to upgrade to a bigger antenna. I live in Gardner KS and I can pick up KCTV5 and WDFA-FOX4 HDTV over-the-air signals, but I can't get KMBC's. I can get the standard TV signal . . . fairly clearly . . . is there any solution to my predicament?" *See* Exhibit B. It should be noted that Gardner, Kansas, is approximately only 30 miles southwest from KMBC-DT's transmitter site, *see* Engineering Statement, Figure 1, and as such, this frustrated viewer is located well within KMBC-DT's predicted service area.

Attached as Exhibit B are additional sample e-mails recently received by KMBC-DT that demonstrate the frustration occurring among viewers who are trying to receive KMBC-DT as the only VHF DTV station in the Kansas City market. It can be quite difficult sometimes to explain to a viewer that, despite the fact that the viewer can receive all of the other stations in the market, to receive KMBC-DT he or she must incur the additional expense and inconvenience of installing a different and larger antenna. Thus, while the proposed Channel 29 allotment is theoretically predicted to cover fewer persons, such loss is mitigated by the real word reception problems associated with being the only VHF station in the market. In addition, the public will benefit by not having to worry about purchasing and installing a separate antenna to receive the lone VHF station in the market.

In addition to solving the public's VHF reception problem, the theoretical population loss associated with the proposed Channel 29 operation is offset for the following reasons. First, the allotment of Channel 29 to KMBC-DT would provide service to approximately 86,000 more persons than the DTV allotment that the Commission originally assigned to KMBC-DT.[2] *See id.*,

[2] The Commission, in *Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, Second Memorandum Opinion and Order on Reconsideration of the Fifth and Sixth Report and Orders, 14 FCC Rcd 1348 (1998), originally allotted Channel 14 to KMBC-DT. Due to land mobile interference concerns, the Commission changed KMBC-DT's allotment to Channel 7. *See Amendment of Section 73.622(b) (Kansas City, Missouri)*, Report and Order, 16 FCC Rcd 14488 (2001).

at 4. Second, despite creating a small ABC Network white area, the proposed substitution of Channel 29 would provide first ABC Network service to 20,947 persons and net new ABC Network service to 7,591 more persons than the current Channel 9 allotment. *See id.*, at 5. And third, allotment of Channel 29 would result in an increase of service within KMBC-DT's DMA (Kansas City, Missouri) of 1,922 more persons than the current Channel 9 allotment. *See id.*, at 6.

Finally, allotment of Channel 29 for KMBC-DT would result in significant cost savings for Hearst. As indicated earlier, KMBC-DT and KCWE are commonly owned. Thus, KCWE's current Channel 29 antenna and Channel 29 transmitter can be repurposed for Channel 29 operation by KMBC-DT. Indeed, the Channel 29 antenna and transmission line that are now in place for KCWE can be used as is, and the Channel 29 transmitter can easily be retrofitted for DTV operation. *See id.*, at 7. On the other hand, in order to implement the Channel 9 allotment, Hearst would be required to purchase a new directional antenna. And, since Hearst's current Channel 9 transmitter is nearly obsolete, Hearst would likely need to purchase a new Channel 9 transmitter. Hearst estimates that the implementation of the proposed Channel 29 operation would result in an initial cost savings of more than $400,000 compared to the implementation costs for the allotted Channel 9 operation.

For the foregoing reasons, Hearst submits that changing KMBC-DT's DTV allotment to Channel 29 is in the public interest. However, in the event the Commission is unable to accommodate this request, Hearst respectfully requests that the Commission modify KMBC-DT's Channel 9 allotment to permit KMBC-DT to implement its Channel 9 digital operation with its current NTSC Channel 9 non-directional antenna. Hearst has considered the alternative option of remaining on its current DTV Channel 7 for post-transition operation.

However, Hearst has concluded that this option has been foreclosed by the allotment of Channel 7 for KQTV-DT, St. Joseph, Missouri. *See id.*, at 8. As such, in lieu of Channel 29, KMBC-DT's only alternative other than it current allotment is non-directional operation on Channel 9.

Specifically, and only in the event KMBC-DT's allotment cannot be changed to Channel 29, Hearst requests that the Commission change the data in Appendix B for KMBC-DT's post-transition operation to specify non-directional operation on Channel 9 as follows:

Alternative Request to Change the DTV TOA

Current TOA Data for KMBC-DT	Requested Alternative TOA Data for KMBC-DT
Channel 9	Channel 9
357 meters HAAT	357 meters HAAT
85 kW ERP	28 kW ERP
Directional	Non-Directional

While implementation of this alternative request would not have the same exact cost savings as the preferred Channel 29 operation, Channel 9 non-directional operation would permit KMBC-DT to implement DTV operation on Channel 9 without having to purchase a new directional antenna. And, while compliance with the Commission's current 0.1 percent interference standard would result in a loss of service in some areas, the population loss would be slightly smaller than the preferred Channel 29 substitution. *See id.*, at 7. Moreover, upon the finalization of the DTV TOA and Commission's possible adoption of a relaxed interference standard in the *Third Periodic Review*, MB Docket No. 07-91, it is possible that non-directional operation on Channel 9 would ultimately permit KMBC-DT to cover more persons and area than

the current directional Channel 9 allotment. Nonetheless, any Channel 9 operation would still have the VHF reception problem in the Kansas City market and as such, the requested Channel 29 allotment is much preferred.

* * * * *

For the reasons set forth above, the Commission should reconsider the KMBC-DT allotment in the DTV TOA and Appendix B and instead specify Channel 29, non-directional, 358 meters HAAT, and 1000 kW ERP for the KMBC-DT post-transition digital facility. In the alternative, the Commission should change KMBC-DT's allotment to specify non-directional operation on Channel 9.

Respectfully submitted,

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December 10, 2007

EXHIBIT A

Engineering Statement
(Attached)

BERNARD R. SEGAL, P. E.
CONSULTING ENGINEER
KENSINGTON, MARYLAND

ENGINEERING EXHIBIT
PETITION FOR SPECIAL RELIEF
KMBC HEARST-ARGYLE TELEVISION, INC.
STATION KMBC-DT, KANSAS CITY, MISSOURI

The FCC, pursuant to an election by KMBC Hearst-Argyle Television, Inc. (hereafter, Hearst-Argyle), has adopted the DTV post-transition allotment of Channel 9 with maximum ERP of 85 kW and antenna radiation center height of 357 meters above average terrain for Station KMBC-DT, Kansas City, Missouri, in Appendix B of the Seventh Report and Order and Eighth Further Notice of Proposed Rule Making in MB Docket No. 87-268. The allotment requires a directional antenna.

By means of the instant Petition for Special Relief, Hearst-Argyle, now, seeks to substitute Channel 29, non-directional operation, with 1000 kW ERP and antenna radiation center height of 358 meters above average terrain for the facilities for KMBC-DT in the referenced Appendix B. This Engineering Exhibit provides relevant supporting information.

Channel 29, currently, is occupied by analog Station KCWE, Kansas City, Missouri. The licensee of Station KCWE and the licensee of KMBC-DT are commonly owned. KCWE-DT has been allotted Channel 31 in Appendix B, and, currently, is licensed and operating on Channel 31 in accordance with the allotment. Thus, upon cessation of analog operations on February 17, 2009, Channel 29 would be available for digital use at Kansas City, by KMBC-DT. Hearst- Argyle, herein, proposes that KMBC-DT be allotted Channel 29 with maximum permissible ERP of 1000 kW and antenna height above average terrain of 358 meters. The height proposed for KMBC-DT on Channel 29 is the same as for the present KCWE Channel 29 antenna.

An allocation study, using the FCC's Longley-Rice prediction methodology, and the post-transition database, has been conducted for the proposed Channel 29 allotment for KMBC-DT. A maximum permissible interference allowance of 0.1 % was specified. No changes were made to the FCC's default terrain sampling values, or to any other

default value. The study was conducted using a Sunblade computer that has been found to replicate FCC results many times in the past. The 2000 Census was used for the population enumerations that are presented herein.

The allocation study showed that no interference would be caused to, or received from, any full service station in the Appendix B, Proposed DTV Table of Allotments Information, or to, or from, any Class A station. The Channel 29 proposal for KMBC-DT conforms with the 0.1 % interference standard that was used in the development of the Appendix B, post transition Proposed Table of Allotments Information.

For comparison purposes, a similar study as for the Channel 29 proposed allotment, was conducted for the Channel 9 allotment for KMBC-DT. Figure 1 compares the proposed KMBC-DT, Channel 29, noise-limited, dipole adjusted, 41 dBu, F(50,90), contour with the noise-limited, 36 dBu, F(50,90) contour for the Channel 9 allotment facilities that are set forth in Appendix B. Figure 2 summarizes the populations and areas included within each contour based on the 2000 Census. The results shown were part of the allocation studies that were conducted for each station.

Figure 2 shows that the Channel 9 operation for KMBC-DT would provide interference-free, noise-limited, service to 2,334,115 persons in 34, 727 square kilometers. The Channel 29 operation would provide interference-free, noise-limited service to 2,283, 461 persons in 33,461 square kilometers. Using the FCC's rounding procedures, the population numbers, respectively, are 2,334,000 and 2,283,000 persons. The Channel 9 operation would provide interference-free service to 51,000 more persons than would the Channel 29 operation.

This "population served" disparity is no different than occurred for many stations that had analog VHF facilities and were allotted UHF channels for the DTV operations. For these stations, the 1000 kW maximum permissible UHF power ceiling automatically

precluded 100 % replication. In Kansas City, Stations WDAF-DT and KCTV-DT, Channels 34 and 24, respectively, are each allotted 1000 kW. The dipole adjusted 41 dBu, F(50,90) reference contours for these stations extend 102 kilometers and 101 kilometers, respectively. Their respective Channel 4 and Channel 5, 47 dBu, F(50,50), analog contours extend 108 kilometers and 107 kilometers. Thus, replication shortfalls are not rare in the allotment process.

Moreover, a comparison of the Channel 29 facilities that are now proposed with the facilities that were originally proposed for KMBC-DT in Appendix B of the Sixth Report and Order in MM Docket No. 87-268, adopted April 3, 1997, and released April 21, 1997, shows that the proposed Channel 29 facilities will provide service to more persons in a greater area than was originally contemplated for KMBC-DT.

The FCC in 1997 allotted Channel 14 to KMBC-DT. The specified facilities were for an effective radiated power of 450.9 kW and an antenna radiation center height above average terrain of 357 meters using the same site as is specified for KMBC-DT's Channel 9 and proposed Channel 29 operations. The population that was shown for the proposed Channel 14, DTV operation, was 1,967,000 persons in an area of 30,971 square kilometers. Since the population was based on the 1990 Census, the undersigned updated the study for the 2000 Census so as to be relatable to the 2000 Census population enumerations used for the Channel 9 and Channel 29 studies.

First, the FCC's "tv_process" allocation study program was performed for the Channel 14 facilities using the pre-transition database and the 1990 Census. This procedure yielded a 99.9% replication of the population and a 97.2 % replication of the area that were listed for KMBC-DT, Channel 14, operation in the Sixth Report and Order. These results provided a reasonable threshold of confidence for re-running the study, but this time using the 2000 Census.

On the basis of the 2000 Census, the Channel 14 population that would be served was determined to be 2,197,237 persons (rounded to 2,197,000 persons) in an area of 30,053 square kilometers. In contrast, as shown in Figure 2, the proposed Channel 29 operation would provide service to 2,283,000 persons in 33,461 square kilometers. Relative to the original Channel 14 allotment, the Channel 29 proposed allotment would provide service to 86,000 more persons residing in an area that is greater by 3,408 square kilometers.

At the time of the Sixth Report and Order, the Channel 14 allotment, if implemented for KMBC-DT, was perceived to be a potential problem because of the need to afford protection to land mobile operations on frequencies adjacent to the Channel 14 lower band edge. Several hundred land mobile operations were identified in the Kansas City area within 3 MHz of the lower Channel 14 band edge. With the prospect that many interference issues could arise on Channel 14, a different channel allotment was deemed to be a preferred path to follow for KMBC-DT.

As a consequence, an alternate allotment on Channel 7 was identified as being feasible. A Petition was submitted to change the Channel 14 allotment to Channel 7. The Petition was ultimately granted, and KMBC-DT currently operates on Channel 7. In the election process, Hearst-Argyle opted for DTV operation on the present analog Channel 9, in lieu of Channel 7.

In any event, a study has been conducted to determine the post-transition services that would be available within the channel 29 gain and loss areas for KMBC-DT relative to the Channel 9 allotment in the Seventh Report and Order and Eighth Further Notice of Proposed Rule Making. Figure 3 shows the noise-limited contours of those stations that would provide service within the otherwise gained and lost areas for the KMBC-DT, Channel 29, operation. Figure 4 identifies the stations in Figure 3 and provides a listing

of their facilities. Figure 5 provides a tabulation of the populations within the various gain and loss segments that are depicted in Figure 3.

Of the 20,947 persons within the gain area, 719 persons would have available one other over-the-air service source; 2,045 persons would have two other services available: 330 persons would have three other services available; 1,681 persons would have four other services available, and the remaining 16,172 persons would have five, or more, other services available.

Of the 71,576 persons in the loss area, 8,669 persons would have no other over-the-air service available; 719 persons would have one over-the-air service available; 2,045 persons would have two such services available; 330 persons would have three such services available; 1,681 persons would have four such services available; and the remaining 16,172 persons would have five, or more, such services available.

Station KMBC-DT is the ABC Network affiliate in Kansas City. A study has been conducted to ascertain the ABC Network gains and losses that would occur if the Channel 29 proposed allotment were to be substituted for the Channel 9 allotment for KMBC-DT. Figure 6 graphically depicts the noise-limited contours for the Channel 29 and 9 operations for KMBC-DT together with the noise-limited contours for ABC Network affiliate Stations KQTV-DT, St. Joseph, and Station KTKA-DT, Topeka. These are the only two stations that would provide ABC Network over-the-air service within the KMBC-DT, Channel 29 gain and loss areas.

The proposed KMBC-DT, Channel 29, operation would provide a first ABC Network service in an area where 20,947 persons reside. On the other hand, 13,356 persons reside in the area that would lose over-the air ABC Network service. The proposed Channel 29 operation for KMBC-DT has the prospect for providing over-the air ABC Network service to 7,591 more persons than the proposed Channel 9 allotment.

While the noise-limited service that would be provided may be considered an important metric for evaluation purposes, there is, yet, another metric that is often considered in evaluating service in the market-place. That metric is related to the service provided within the Designated Market Area (DMA), - a metric that was devised by Nielsen Media Research.

Figure 7 shows the respective Channel 9 and Channel 29 noise-limited contours for KMBC-DT overlaid on a map that depicts the Kansas City, Kansas-Missouri DMA. The counties that comprise the DMA have a total population of 2,198,074 persons. The noise-limited contour for the KMBC-DT Channel 9 allotment includes 2,017,097 persons within the DMA, or almost 92 % of the DMA population. The proposed KMBC-DT Channel 29 allotment includes 2,019,019 persons within the DMA, or almost 92 % of the DMA population. Insofar as service to the DMA is concerned, the proposed Channel 29 allotment is, essentially, on a par with the proposed Channel 9 allotment. In actuality, it would provide service to 1,922 more persons within the DMA than would the proposed Channel 9 allotment.

There are at least two other cogent items for consideration. Eight stations are allotted to Kansas City, and of the eight DTV allotments, all, but KMBC-DT, are in the UHF band. With the preponderance of the market stations operating in the UHF band, there is little incentive for over-the-air viewers to install a separate antenna for VHF reception, particularly for indoor reception purposes,- -given the physical size discrepancy for a VHF antenna vis-a-vis a UHF antenna.

Viewed from a public interest standpoint, practical considerations suggest that if all the stations in the market are UHF, the public will benefit by not having to be concerned with the expense of a separate antenna purchase to receive the lone VHF station in the market.

Another consideration, from the Hearst-Argyle vantage point, is that the proposed Channel 29 operation can be implemented at lower cost when compared with the cost for implementing the proposed Channel 9 allotment. For operation on Channel 29, the analog transmitter that is on hand is of sufficiently recent vintage that it, readily, can be retrofitted for DTV compliant performance. The transmission line and antenna that are now in place can be used as is.

On the other hand, in order to implement the Channel 9 allotment, a new antenna and a new transmitter will be required. The current Channel 9 antenna is non-directional, and the allotment is for the use of a directional antenna. The Channel 9 analog transmitter that is currently in use, is very old, and a retrofit for DTV compliant operation is not practical. A new DTV transmitter would have to be purchased. Hearst-Argyle has investigated the costs involved for each scenario, and has determined that implementation of the Channel 29 proposed operation will result in a cost savings of more than $400,000.

Should the FCC conclude that the Channel 29 option for KMBC-DT is not sufficiently meritorious to warrant adoption, then Hearst-Argyle proffers non-directional operation on Channel 9 with an effective radiated power of 28 kW and an antenna radiation center height of 357 meters above average terrain, as a substitute. In this fashion, the existing Channel 9 antenna could continue to be employed. Using the FCC's post transition database, no station would receive interference in excess of 0.1 % from this mode of operation for KMBC-DT.

Figure 8 provides a comparison of the populations and areas for the Channel 9, 85 kW (Max-DA) operation in Appendix B with the Channel 9, 28 kW, Non-DA, fallback option. The fallback option would provide net service to 48,000 fewer people than would the directional, Channel 9, proposed allotment.

Channel 7 is not a fallback option for consideration for KMBC-DT operation. Channel 7 has been allotted to St Joseph, Missouri, for use by Station KQTV-DT. Station KQTV-DT is approximately 65 kilometers from Station KMBC-DT, which is too close for a viable co-channel operation.

The population enumerations for the zones wherein fewer than five other services would be available within the Channel 29 gain and loss areas were conducted in the following manner. The various zones were re-drawn on 2000 Census County Subdivisions maps for Kansas and Missouri, and an enumeration of the populations that were within the county subdivisions was made for each zone. The included populations were in proportion to the included area. Where a subdivision included a city, or other separately defined area of high population density, the region of high density was first subtracted from the total subdivision population. If appropriate, the region of high population density was separately listed for inclusion in the enumeration.

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 7, 2007.

Bernard R. Segal, P.E.

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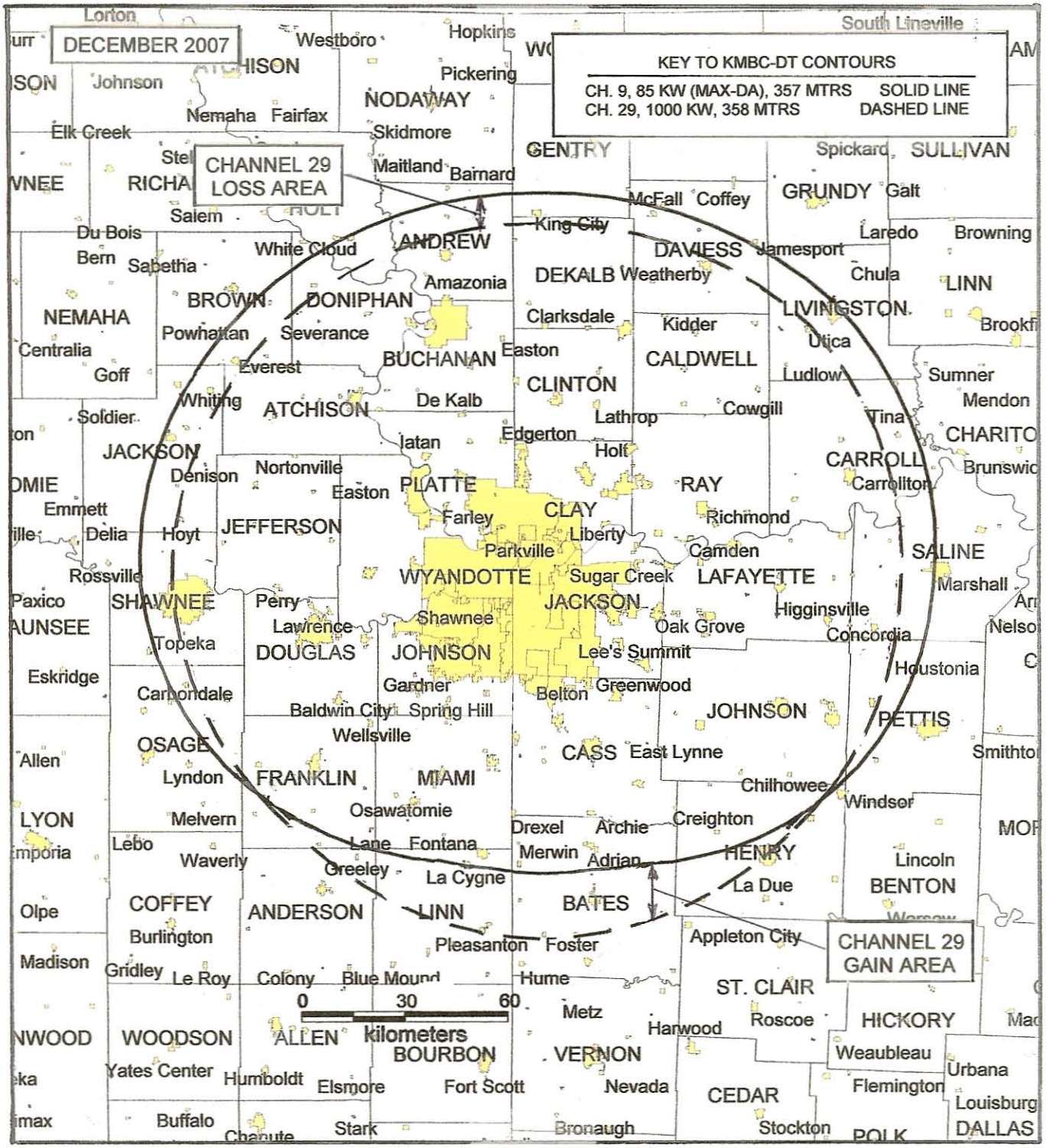
FIGURE 1



CALCULATED F(50,90) NOISE-LIMITED CONTOURS

KMBC HEARST-ARGYLE TELEVISION, INC.
STATION KMBC-DT, KANSAS CITY, MISSOURI

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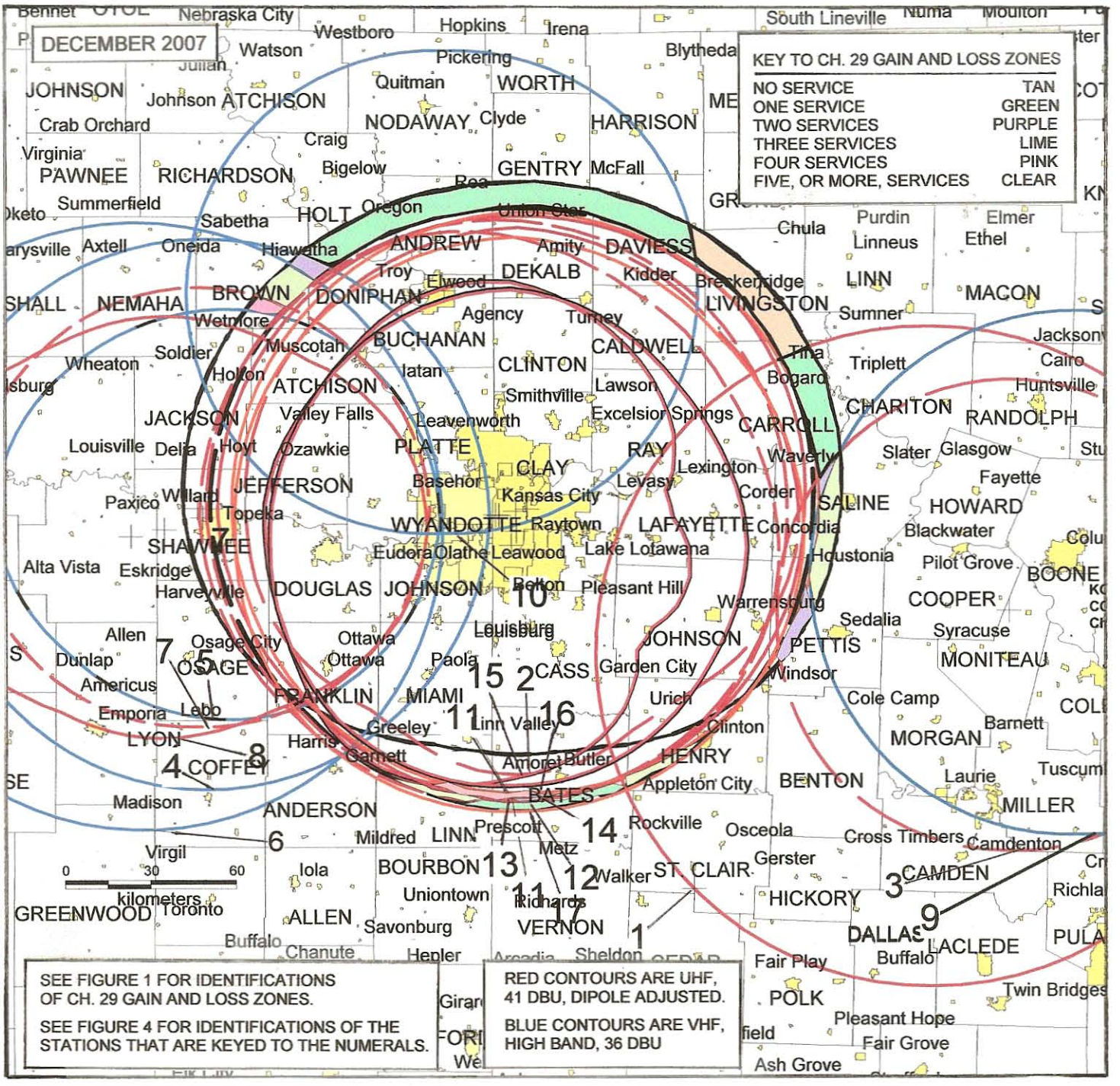
Figure 2

POPULATION AND AREA SUMMARY
KMBC-DT, KANSAS CITY, MISSOURI

A: CH. 9, 85 kW (Max-DA), 357 mtrs.	POPULATION (2000 Census)	AREA (km^2)
Within noise-limited contour	2,341,749	35,869
Not affected by terrain losses	2,334,115	34,727
Lost due to DTV Interference	25	20
Net service	2,334,090	34,707
Net service per FCC rounding	2,334,000	34,707
FCC net service per Appendix B	2,334,000	34,707
B: CH. 29, 1000 kW, 358 mtrs.		
Within noise-limited contour	2,284,823	33,873
Not affected by terrain losses	2,283,461	33,461
Lost due to DTV interference	0	0
Net service	2,283,461	33,461
Net service per FCC rounding	2,283,000	33,461

FIGURE 3



OTHER NOISE-LIMITED DTV SERVICES WITHIN THE KMBC-DT, CHANNEL 29, GAIN AND LOSS AREAS

KMBC HEARST-ARGYLE TELEVISION, INC.
STATION KMBC-DT, KANSAS CITY, MISSOURI

Bernard R. Segal, P. E. Consulting Engineer

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Figure 4

IDENTIFICATIONS OF STATIONS PROVIDING
NOISE-LIMITED SERVICE WITHIN THE
KMBC-DT, CHANNEL 29, GAIN AND LOSS AREAS

FIGURE 3 MAP ID	CALL SIGN/LOCATION/FACILITIES
1	KMOS-DT/Sedalia, MO/CH. 15, 322 kW, 603 mtrs.
2	KTAJ-DT/St. Joseph, MO/CH. 21, 1000 kW (Max-DA), 316 mtrs.
3	KMIZ-DT/Columbia, MO/CH. 17, 50 kW, 348 mtrs.
4	KTWU-DT/Topeka, KS/CH. 11 (Max-DA), 15.4 kW, 305 mtrs.
5	NEW/Topeka, KS/CH.12, 3.2 kW (Max-DA), 225 mtrs.
6	WIBW-DT/Topeka, KS/CH.18.1 kW (Max-DA), 421 mtrs.
7	KSNT-DT/Topeka, KS/CH. 27, 50 kW, (Max-DA), 320 mtrs.
8	KTKA-DT*/Topeka, KS/CH.49, 123 kW (Max-DA), 451 mtrs.
9	KOMU-DT/Columbia, MO/CH. 8,13.6 kW (Max-DA),474 mtrs.
10	KQTV-DT*/St. Joseph, MO/CH. 7, 7.45 kW (Max-DA), 247 mtrs.
11	KCTV-DT/Kansas City, MO/CH. 24, 1000 kW (Max-DA), 319 mtrs.
12	KCWE-DT/Kansas City, MO/CH. 31, 1000 kW, 332 mtrs.
13	WDAF-DT/Kansas City, MO/CH. 34, 1000 kW (Max-DA), 344 mtrs.
14	KSHB-DT/Kansas City, MO/CH 42, 450 kW (Max-DA), 276 mtrs.
15	KMCI-DT/Lawrence, KS/CH. 41 (Max-DA), 551 kW, 291 mtrs.
16	KSMO-DT/Kansas City, MO/CH. 47, 1000 kW, 356 mtrs.
17	KPXE-DT/Kansas City, MO/CH. 51, 1000 kW, 339 mtrs.

NOTE: An asterisk denotes an ABC Network affiliated station.

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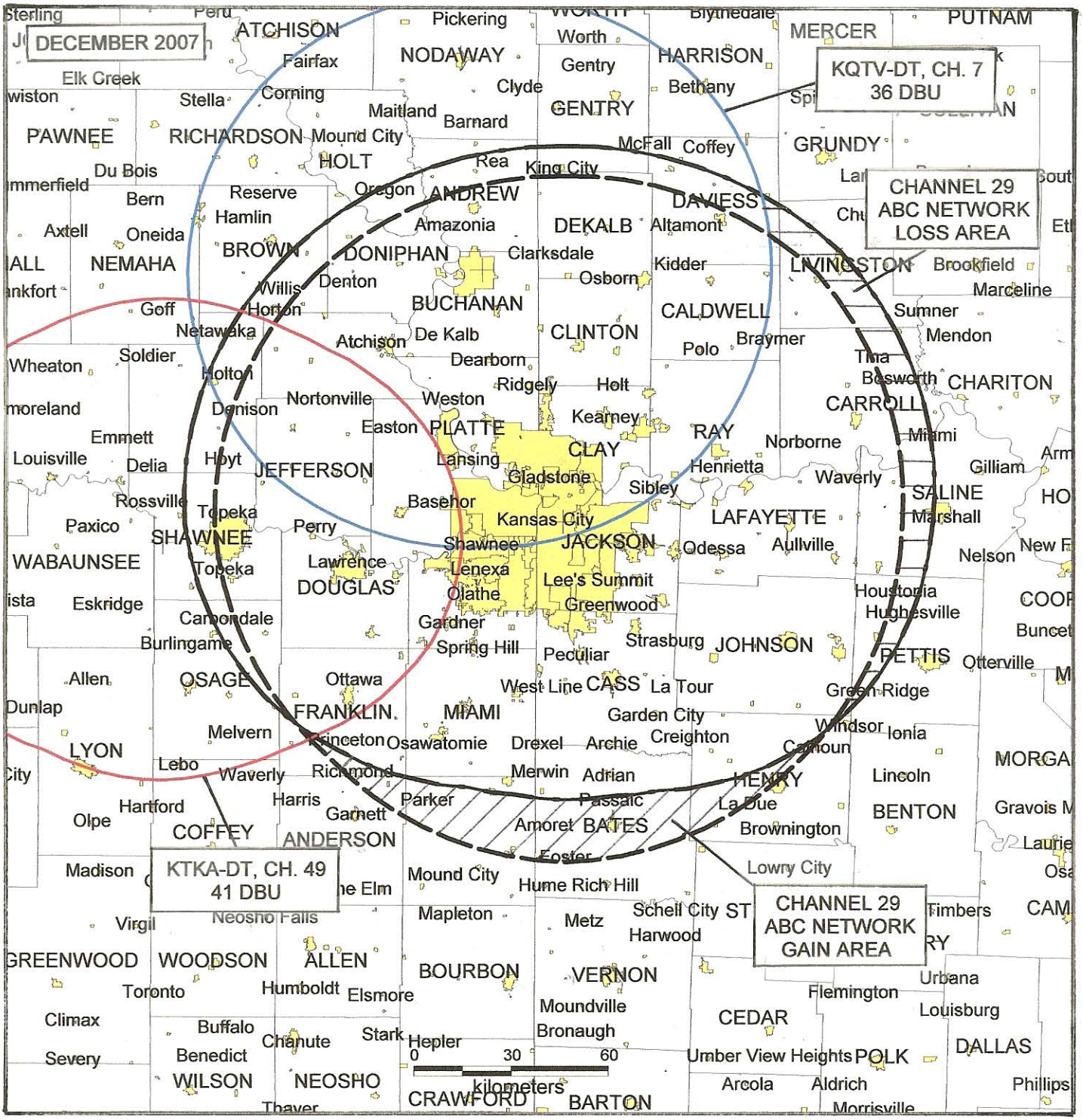
CONSULTING ENGINEER
KENSINGTON, MARYLAND

Figure 5

OTHER NOISE-LIMITED SERVICES
WITHIN THE KMBC-DT, CHANNEL 29,
GAIN AND LOSS AREAS

A: WITHIN THE GAIN AREA	FIGURE 3 MAP HUE	POPULATION (2000 Census)
1) Zone of no other service	TAN	0
2) Zone of one other service	GREEN	719
3) Zone of two other services	PURPLE	2,045
4) Zone of three other services	LIME	330
5) Zone of four other services	PINK	1,681
6) Zone of five, or more, other services	NONE	16,172
	TOTAL	20,947

B: WITHIN THE LOSS AREA		
1) Zone of no other service	TAN	8,669
2) Zone of one other service	GREEN	8,255
3) Zone of two other services	PURPLE	440
4) Zone of three other services	LIME	3,016
5) Zone of four other services	PINK	219
6) Zone of five, or more, services	NONE	50,977
	TOTAL	71,576

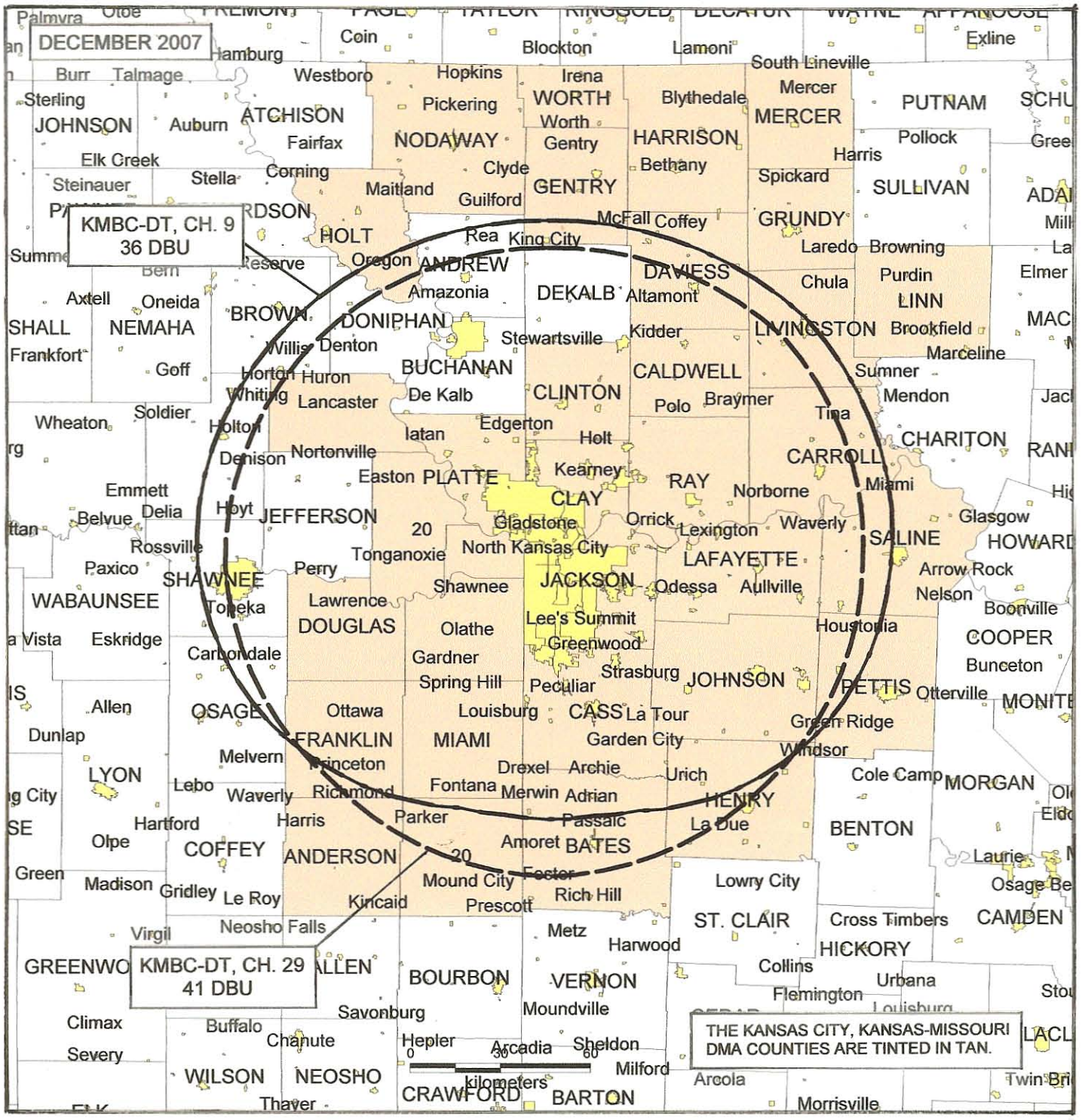


ABC NETWORK NOISE-LIMITED DTV SERVICES
WITHIN THE KMBC-DT, CHANNEL 29,
GAIN AND LOSS AREAS

KMBC HEARST-ARGYLE TELEVISION, INC.
STATION KMBC-DT, KANSAS CITY, MISSOURI

Bernard R. Segal, P. E. Consulting Engineer

FIGURE 7



KMBC-DT, CHANNEL 9 AND CHANNEL 29 SERVICE WITHIN THE KANSAS CITY, KANSAS-MISSOURI, DMA

KMBC HEARST-ARGYLE TELEVISION, INC.
STATION KMBC-DT, KANSAS CITY, MISSOURI

Bernard R. Segal, P. E. Consulting Engineer

BERNARD R. SEGAL, P. E.
CONSULTING ENGINEER
KENSINGTON, MARYLAND

Figure 8

POPULATION AND AREA SUMMARY
KMBC-DT, KANSAS CITY, MISSOURI

A: CH. 9, 85 kW (Max-DA), 357 mtrs.	POPULATION (2000 Census)	AREA (km^2)
Within noise-limited contour	2,341,749	35,869
Not affected by terrain losses	2,334,115	34,727
Lost due to DTV Interference	25	20
Net service	2,334,090	34,707
Net service per FCC rounding	2,334,000	34,707
FCC net service per Appendix B	2,334,000	34,707
B: CH. 9, 28 kW, 357 mtrs.		
Within noise-limited contour	2,293,215	34,368
Not affected by terrain losses	2,286,601	33,246
Lost due to DTV interference	255	72
Net service	2,286,346	33,174
Net service per FCC rounding	2,286,000	33,174

EXHIBIT B

Sample Viewer E-Mails
(Attached)

danny_the_genius@hotmail.com

11/26/2007 10:02 PM

To: engineering@thekansascitychannel.com
cc:
Subject: Web Viewer Feedback

EMAIL SUBJECT:
TheKansasCityChannel.com - Website Feedback

MESSAGE:
I just switched to HDTV and I am able to receive all KC area channels in HD except KMBC9. The analog ch 9 sometimes displays HD (not from the TV set, but in your programming) but I'm sure it's still analog broadcast. Am I doing something wrong?

EMAIL ADDRESS:
danny_the_genius@hotmail.com
^^^^^^^^^^ {ts '2007-11-26 22:02:42'} ^^^^^^^^^^

"Yancey, Karen"
<kyancey@ibsys.com>
11/26/2007 07:05 AM

To: "Jerry M Agresti" <JAgresti@hearst.com>
cc:
Subject: FW: Web Viewer Feedback

Karen A. Yancey
Managing Editor
http://www.kmbc.com
KMBC-TV
816.760.9109
kyancey@kmbc.com
-----Original Message-----
From: jpiano3@sbcglobal.net [mailto:jpiano3@sbcglobal.net]
Sent: Sunday, November 25, 2007 10:58 PM
To: kcnews
Subject: Web Viewer Feedback

EMAIL SUBJECT:
TheKansasCityChannel.com - Website Feedback

MESSAGE:
I just bought a Toshiba HD TV and I have been unsuccessfully trying to receive your signal by antenna. Can you tell me the physical digital channel for channel 9?
Joyce Berg

EMAIL ADDRESS:
jpiano3@sbcglobal.net
^^^^^^^^^^ {ts '2007-11-25 22:58:17'} ^^^^^^^^^^

jmet@kc.rr.com
11/24/2007 07:14 PM

To: engineering@thekansascitychannel.com
cc:
Subject: Web Viewer Feedback

EMAIL SUBJECT:
TheKansasCityChannel.com - Website Feedback

MESSAGE:
I just was curious if KMBC has any plans to strengthen its HDTV signal or if perhaps there's something wrong with my current system and I need to upgrade to a bigger antenna. I live in Gardner KS and I can pick up KCTV5 and WDAF-FOX4 HDTV over-the-air signals, but I can't get KMBC's. I can get the standard TV signal a fairly clearly... is there any solution to my predicament?

Thanks.

Rob Tilton

EMAIL ADDRESS:
jmet@kc.rr.com
^^^^^^^^^^ {ts '2007-11-24 19:14:36'} ^^^^^^^^^^

cnicely@kc.rr.com
11/24/2007 04:16 PM

To: engineering@thekansascitychannel.com
cc:
Subject: Web Viewer Feedback

EMAIL SUBJECT:
TheKansasCityChannel.com - Website Feedback

MESSAGE:
How come I can't pick up Channel 9 over the air in HD? I am able to get all of the other stations in HD, but not Channel 9

Chris Nicely
913-685-0469

EMAIL ADDRESS:
cnicely@kc.rr.com
^^^^^^^^^^ {ts '2007-11-24 16:16:43'} ^^^^^^^^^^

les@jivetones.com
11/23/2007 09:46 PM

To: engineering@thekansascitychannel.com
cc:
Subject: Web Viewer Feedback

EMAIL SUBJECT:
TheKansasCityChannel.com - Website Feedback

MESSAGE:
I am located near the grandview triangle.I have a new HD TV with built-in digital tuner with an HD rabbit ear antenna. I can recieve channel 4 on 4.1,5 is 5.1 19 is 19.1 thru .4 and so on. I can not get a digital signal from 9 It is on 9 not 9.1
I am a KU fan and would like to see it in HD.
any help would be appreciated
thanks

EMAIL ADDRESS:
les@jivetones.com
^^^^^^^^^^ {ts '2007-11-23 21:46:40'} ^^^^^^^^^^

brian_d_clark@yahoo.com

11/19/2007 05:11 PM

To: engineering@thekansascitychannel.com
cc:
Subject: Web Viewer Feedback

EMAIL SUBJECT:
TheKansasCityChannel.com - Website Feedback

MESSAGE:
I am unable to recieve your OTA digital signal. I live in cleveland, MO, 64734. I recieve your analog signal "clear as a bell", your analog signal is the clearest of all OTA signals. However, your OTA digital signal is not sufficient for me to recieve. I currently can get all local TV stations digitally except KMBC. When the day finally comes that broadcast stop analog, I will not be able to enjoy KMBC. What is your signal strength to south Kansas City? What recommendations do you have? Thank you for your assistance in this as I do not want to lose access to you programming.

EMAIL ADDRESS:
brian_d_clark@yahoo.com
^^^^^^^^^^ {ts '2007-11-19 17:11:33'} ^^^^^^^^^^

pcarlso@crosspaths.net
11/12/2007 07:58 PM

To: engineering@thekansascitychannel.com
cc:
Subject: Web Viewer Feedback

EMAIL SUBJECT:
TheKansasCityChannel.com - Website Feedback

MESSAGE:
I have just moved down to Raymore. I can receive all of the main HD channels down here except yours. Is there just a temporary problem or does not your signal go that far yet? If not when will we be able to receive it?

EMAIL ADDRESS:
pcarlso@crosspaths.net
^^^^^^^^^^ {ts '2007-11-12 19:58:23'} ^^^^^^^^^^